

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOSEPH SHOEMAKER,  
RICHARD GINDIN, DEMYA  
JOHNSON, KIMBERLY  
STARLING, And MATTHEW  
MCCORMICK, individually and  
on behalf of all others similarly  
situated,

Plaintiffs,

v.

RICHARD ZEITLIN,  
AMERICAN TECHNOLOGY  
SERVICES, LLC, UNIFIED  
DATA SERVICES, LLC,  
COMPLIANCE  
CONSULTANTS, LLC, WIRED  
4 DATA, LLC, and JOHN DOES  
1-10, corporate entities and  
individuals presently unknown,

Defendants.

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Civil No. 1:21-cv-01668-CCC

**UNOPPOSED MOTION TO EXTEND TIME TO  
ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendants Richard Zeitlin, American Technology Services, LLC, Unified Data Services, LLC, Compliance Consultants, LLC, and Wired 4 Data, LLC (hereinafter “Plaintiffs”), through their counsel of record, Christopher Sarno, respectfully moves for a nine-day extension of time to file an answer or otherwise respond to the Complaint. This unopposed motion is filed pursuant to Local Rule 7.5.

The current deadline to answer or otherwise respond to the Complaint by December 29, 2021. The Plaintiffs require additional time to respond to the Complaint. One of Plaintiffs’ lead counsel had to travel unexpectedly for a funeral this week, and his work is necessary to responding to this Complaint. Given the unexpected funeral and the upcoming holiday, the Plaintiffs need an additional nine (9) days to respond, to January 7, 2022.

WHEREFORE, the Plaintiffs respectfully move this Court to extend the deadline to answer or otherwise respond to the Complaint by thirty days to January 7, 2022.

Respectfully submitted on December 27, 2021.

CLYMER MUSSER & SARNO PC

Date: December 27, 2021

/s/James N. Clymer  
James N. Clymer, Esq.  
Attorney ID: 27151

**Certificate of Conference**

I hereby certify that the parties conferred regarding this motion and this motion is unopposed.

Dated December 27, 2021.

/s/ Daniel J. Treuden  
Daniel Treuden

**Certificate of Service**

I hereby certify that on December 27, 2021, service was made on the Plaintiff through Counsel of Record using the Court's ECF service.

/s/ Daniel J. Treuden  
Daniel Treuden